

**CERTIFICATION OF CPNI FILING DATED DECEMBER 31,  
2006**

**EB-06-TC-060**

On behalf of The Telephone Company, Inc. ("TTC") and in accordance with Section 64.2009(e) of the Commission's Rules, I hereby certify that I have personal knowledge that TTC has established operating procedures that are adequate to ensure compliance with the rules in Section 64.2009.

Further, I hereby certify that the attached statement explaining how the company's operating procedures ensure compliance with Section 64.2009 is true and correct.

Dated this \_\_ day of January, 2007.

The Telephone Company, Inc.

By: Nels Bentson

Name: Nels  
Bentson

Title: President

Date: 1/11/2007

## **Statement Concerning the Protection of Customer Proprietary Network Information for the Annual Period Ending December 31, 2006**

The Telephone Company, Inc. is a telecommunications carrier subject to the requirements set forth in Section 64-2009 of the Commission's rules.

1. Pursuant to said rules, TTC has established a system by which they can determine whether a customer has given their approval for the release or use of said customer's proprietary network information ("CPNI") prior to that information being used or released.
2. Information protected by TTC includes information that relates to the quantity, technical configuration, type, destination, location and amount of use of a telecommunications service subscribed to by a customer and made available to TTC by the customer solely by virtue of the carrier-customer relationship. Also protected is information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.
3. TTC personnel are trained as to when they are and are not authorized to release or use CPNI and violation of these rules will subject personnel to express disciplinary action.
4. TTC maintains a record of its' sales and marketing campaigns that use customers' CPNI. Further, record of all instances where CPNI was disclosed or provided to third parties or third parties were allowed access to CPNI is maintained by TTC. These records reflect a description of the campaigns, the specific CPNI used in the campaign and what products or services were offered as part of the campaign. These records are retained for a minimum of one year.
5. TTC has established a procedure whereby all sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI and records reflecting carrier compliance with the Commission Rules are maintained for a minimum of one year.